

EXHIBIT “A”

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

IN RE BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION
This Document Relates to Plaintiff
Stacy Miller
2:17-cv-00395-DGC

No. MD-15-02641-PHX-DGC

**AMENDED MASTER SHORT FORM
COMPLAINT FOR DAMAGES FOR
INDIVIDUAL CLAIMS AND JURY
DEMAND**

Plaintiff(s) named below, for their Complaint against Defendants named below,
incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc. 364).

Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

Stacy Miller (Deceased)

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of
consortium claim:

N/A

3. Other Plaintiff and capacity (i.e. administrator, executor, guardian,
conservator):

Ashley Marshall, as Administrator of the Estate of Stacy Miller, Deceased

4. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at
the time of implant:

Stacy Miller (Deceased) - Kentucky

5. Plaintiff's/Deceased Party's state(s) [if more than one Plaintiff] of residence at
the time of injury:

Stacy Miller (Deceased) - Ohio

6. Plaintiff's current state(s) [if more than one Plaintiff] of residence:

Stacy Miller (Deceased) - N/A; Ashley Marshall - Ohio

7. District Court and Division in which venue would be proper absent direct filing:

United States District Court, Eastern District of Kentucky

8. Defendants (check Defendants against whom Complaint is made):

☒ C.R. Bard Inc.

☒ Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

☒ Diversity of Citizenship

☐ Other: _____

☐ Other allegations of jurisdiction and venue not expressed in Master Complaint:

10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is (are) making a claim (check applicable Inferior Vena Cava Filter(s)):

☐ Recovery[®] Vena Cava Filter

☐ G2[®] Vena Cava Filter

☐ G2[®] Express (G2[®] X) Vena Cava Filter

☐ Eclipse[®] Vena Cava Filter

☐ Meridian[®] Vena Cava Filter

☐ Denali[®] Vena Cava Filter

☒ Other: Bard

11. Date of implantation as to each product:

04/05/2007

12. Counts in the Master Complaint brought by Plaintiff(s):

☒ Count I: Strict Products Liability – Manufacturing Defect

-
-
-
-

☒ Yes

☐ No

1 RESPECTFULLY SUBMITTED this 26th day of April 2018.

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3 **LAW OFFICES OF BEN C. MARTIN**

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5 By: /s/ Ben C. Martin

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14 ***ATTORNEYS FOR PLAINTIFF***

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of April 2018 , I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

Ben C. Martin

Ben C. Martin